

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence
of the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington

September 24, 2020

WILLIAM M. McCOOL, Clerk

By Shawn Kattner Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

NO. CR20-163 JLR

INDICTMENT

v.

AL M. TALAGA,
Defendant.

The Grand Jury charges that:

COUNT ONE

(Felon in Possession of a Firearm)

On or about June 1, 2020, in Seattle, within the Western District of Washington,
AL M. TALAGA, knowing he had been convicted of a crime punishable by a term of
imprisonment exceeding one year, that is, *Robbery in the Second Degree*, in cause
number 05-C-09559-4, in the Superior Court of King County, on or about September 26,
2005, did knowingly possess, in and affecting interstate and foreign commerce, a firearm,
to wit, a Glock Model 22 .40 caliber semi-automatic pistol, bearing serial number
BCKX120, that had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1).

1 **ASSET FORFEITURE ALLEGATION**

2 The allegations contained in Count One of this Indictment are hereby realleged
3 and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of
4 the offense alleged in Count One, the Defendant AL M. TALAGA shall forfeit to the
5 United States, pursuant to Title 18, United States Code, Section 924(d)(1), by way of
6 Title 28, United States Code, Section 2461(c), any firearms and associated ammunition
7 involved in or used in the offense, including but not limited to: a Glock Model 22 .40
8 caliber semi-automatic pistol bearing serial number BCKX120 and any associated
9 ammunition.

10 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
11 any act or omission of the defendant,

- 12 1. cannot be located upon the exercise of due diligence;
13 2. has been transferred or sold to, or deposited with a third party;
14 3. has been placed beyond the jurisdiction of the Court;
15 4. has been substantially diminished in value; or,
16 5. has been commingled with other property which cannot be
17 divided without difficulty;

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1 it is the intent of the United States to seek the forfeiture of any other property of the
2 defendant, up to the value of the above-described forfeitable property, pursuant to Title
3 21, United States Code, Section 853(p).


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5
6 A TRUE BILL:

7
8 DATED: September 24, 2020

9 *Signature of foreperson redacted*
10 *pursuant to the policy of the Judicial*
11 *Conference of the United States*

12 _____
FOREPERSON

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14 
15 BRIAN T. MORAN
16 United States Attorney

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18 
19 TODD L. GREENBERG
20 Assistant United States Attorney

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22 
23 CATHERINE L. CRISHAM
24 Assistant United States Attorney